

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA
v.
CALEB BROWN

| Case No. 1:19-MJ-00079-LDA

MOTION FOR NO-CONTACT ORDER

Defendant Caleb Brown (“Brown”) was charged by Criminal Complaint on October 15, 2019 with production of child pornography, enticement of a minor, travelling with intent to have sex with a minor and possession of child pornography, in violation of 18 U.S.C. §§ 2251(a), 2422(b), 2423(b) and 2252(a)(4)(B). The allegations detailed in the Complaint concern Brown’s traveling from New York to Rhode Island where he had sexual contact with Minor Victim 1, a boy who was 15 years old at the time.

The Government was advised yesterday by an official at the Adult Correctional Institute (“ACI”) that Brown has been in regular contact with Minor Victim 1 since his arrest. The ACI advises that since February 11, 2020, there have been approximately 45 telephone conversations between Brown and Minor Victim 1. In addition, Brown sent at least two letters to Minor Victim 1, one of which was intercepted by the ACI and the other by the parents of Minor Victim 1.

The Government respectfully moves this Court to enter an order prohibiting Brown from having any contact whatsoever with Minor Victim 1. Both the Government and the parents of Minor Victim 1 believe that continued contact from Brown further aggravates the damage Brown has already caused Minor Victim 1.

If the Court needs the name and identifying information of Minor Victim 1 to enter a no-contact order, the Government will provide that information in a sealed filing.

Respectfully submitted,

AARON L. WEISMAN
United States Attorney

/s/ Lee Vilker
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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of May, 2020, I caused the Motion for a No-Contact Order to be filed electronically and it is available for viewing and downloading from the ECF system.

Electronic Notification:
Kevin Fitzgerald, Esq.

/s/ Lee Vilker
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